FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST 6194

PRO-TECH INDUSTRIES, INC.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6194. The Department of Ecology (Department) is proposing to issue this permit, which will allow discharge of wastewater to the Clark County/Salmon Creek Publicly Owned Treatment Works (POTW) through the Hazel Dell Sewer District (HDSD). This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law [Revised Code of Washington (RCW) 90.48.080 and 90.48.160] requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit [Chapter 173-216 Washington Administrative Code (WAC)].

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D—Response to Comments.

Table 1: General information

Applicant	Tevis Laspa
Facility Name and Address	Pro-Tech Industries, Inc. (Pro-Tech) 14113 NE 3rd Ct. P.O. Box 933 Vancouver, WA 98666-0933
Type of Facility:	Manufacturing and finishing of aftermarket steel and aluminum products for light and heavy trucks.
Facility Discharge Location	Latitude: 45º 43' 23" N Longitude: 122º 39' 58" W.
SIC Code	3329000 (Other Fabricated Metal Product Manufacturing)
Treatment Plant Receiving Discharge	Clark County/Salmon Creek Publicly Owned Treatment Works (POTW) through the Hazel Dell Sewer District (HDSD)
Contact at Facility	Name: Tevis Laspa Telephone #: (360) 573-6641
Responsible Official	Name: Tevis Laspa Title: CEO Address: same as above Telephone #: same as above FAX #: (360) 573-6687

BACKGROUND INFORMATION

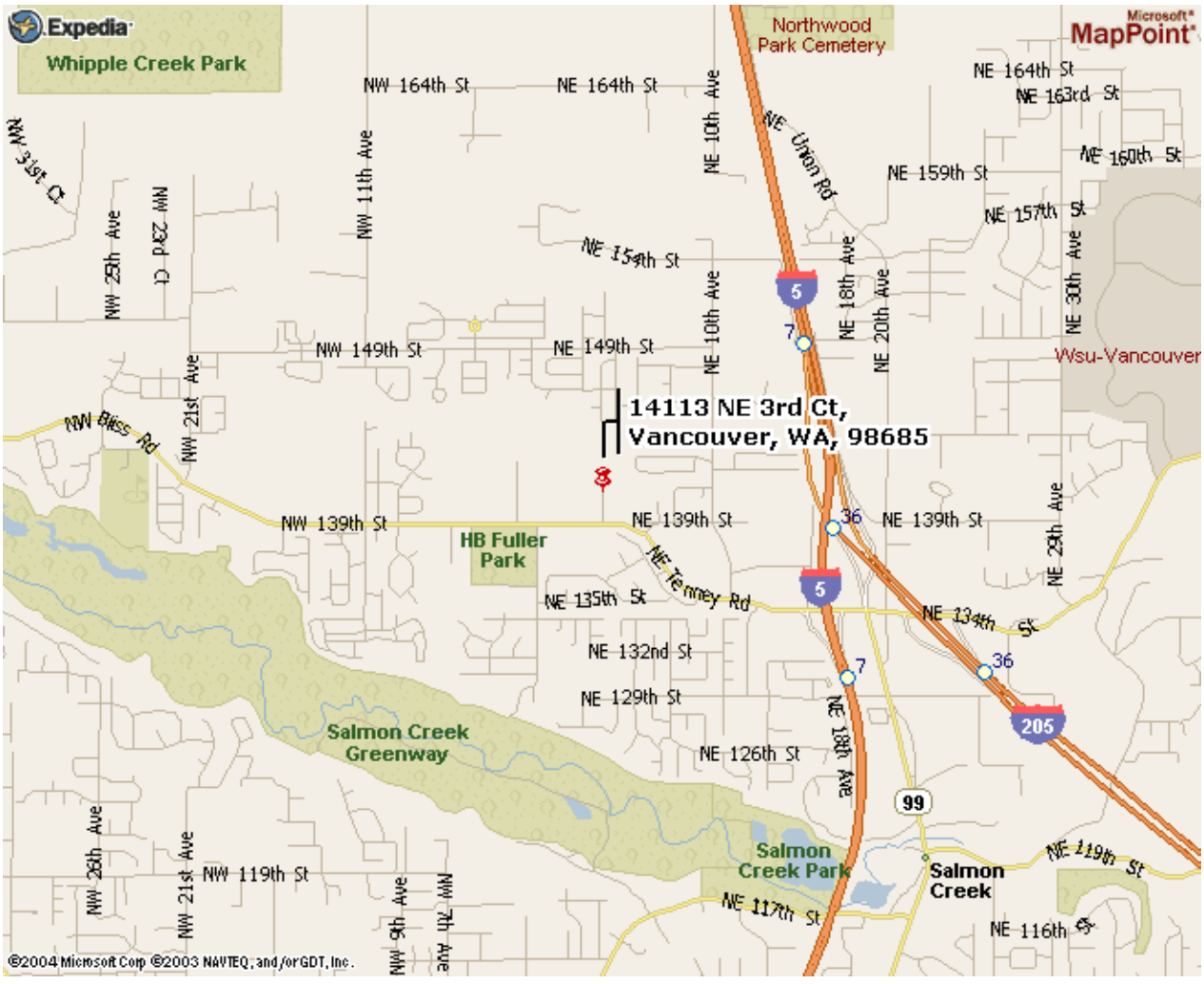
DESCRIPTION OF THE FACILITY

According to Pro-Tech website, http://www.protech.net/, the company has been a manufacturer of truck and tractor trailer accessories with distributors in all 50 states since 1981. It employs 160 people and has two facilities in Vancouver, Washington, and La Vergne, Tennessee.

The permitted facility is located in Vancouver at 14113 Northeast 3rd Court. Pro-Tech Standard Industrial Classification (SIC) Code is 3329000. The facility is a significant industrial user subject to 40 CFR[1] 433.17, Pretreatment standards for new sources (PSNS) for metal finishing point source category.

LOCATION

Figure 1: Pro-Tech vicinity map



[1] Code of Federal Regulations

INDUSTRIAL PROCESSES

Pro-Tech manufactures aftermarket products for light and heavy trucks. These include aluminum and steel toolboxes, cab racks, and flatbeds for light trucks (pickups); and aluminum and steel toolboxes, fenders, and cab guards for heavy trucks. The facility shears, notches, punches, and forms 1/16 through ¼ in thick steel and aluminum sheet. These parts are then welded and assembled into the final product. The parts are put in cartons and then shipped.

Pro-Tech is finding that its existing powder paint process for steel boxes does not have the desired lifetime. A phosphatizing pretreatment is being installed, which will improve the adhesion of the paint to the box. This permit permits discharges from the phosphatizing pretreatment.

TREATMENT PROCESSES

Two chemical are used in the phosphatizing process:

1. Iron phosphatizing compound with the trade name of Secure Steam Plus; contains phosphate that is applied to the bare metal parts, and

2. Non-chrome final seal with the trade name of Secure Seal 8000; contains boric acid and monoethanolamine.

Waste water generated in the phosphatizing process contains above chemicals and has low pH; therefore it is neutralized with zinc phosphatizing additive with the trade name of PGA-OH. The PGA-OH contains sodium hydroxide.

PERMIT STATUS

This is a new facility. On April 15, 2004, Pro-Tech completed an application process for a state waste discharge permit. The Department did not act on that application within 60 days; therefore under the provisions of Chapter 90.48.200 RCW, Pro-Tech received a Temporary State Waste Discharge Permit effective June 15, 2004. This temporary permit will remain in effect until this proposed permit is issued.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on April 14, 2004.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the engineering report. The proposed wastewater discharge is characterized for the following parameters:

Table 2: Wastewater characterization

Analyte	3/2/2004 Influent Analytical Results (mg/L)	12/17/2003 Pilot Test Analytical Results (mg/L)	3/2/2004 Pilot Test Analytical Results (mg/L)
pH	7.32	7.2	6.07
Total suspended solids (TSS)	3.00	2	23
5 day biological oxygen demand (BOD_5)	--	380	--
Arsenic	<0.01	0.11	<0.01
Barium	0.04	0.23	0.23
Beryllium	<0.01	<0.05	<0.01
Cadmium	<0.004	<0.05	<0.004
Chlorine Demand	--	4	--
Chromium	<0.02	<0.05	<0.02
Copper	0.11	0.08	0.05
Cyanide	--	<0.01	--
Iron	<0.1	0.94	11
Lead	<0.004	<0.05	0.037
Mercury	--	<0.0005	--
Nickel	<0.01	<0.05	0.02
Selenium	<0.1	<0.05	<0.1
Silver	<0.01	<0.05	<0.01
Zinc	<0.1	0.17	0.7
Phenols	--	0.3	--
Oil and Grease	--	31	--
Total Toxic Organics (TTO)	--	0.63	--

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR[2] 433.17, Pretreatment standards for new sources (PSNS) for metal finishing point source category, **Table 3**.

[2] Code of Federal Regulations

Table 3 Pretreatment standards for new sources (PSNS) for metal finishing point category

Parameter	Maximum for any 1 day	Monthly average shall not exceed
	milligrams per liter (mg/L)	
Cadmium (T[3])	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO[a]	2.13	

[a] The term "TTO", according to 40 CFR § 433.11, shall mean total toxic organics, which is the summation of all quantifiable values greater than 0.01 milligrams per liter for the following toxic organics:

- ✓ Acenaphthene
- ✓ Acrolein
- ✓ Acrylonitrile
- ✓ Benzene
- ✓ Benzidine
- ✓ Carbon tetrachloride (tetrachloromethane)
- ✓ Chlorobenzene
- ✓ 1,2,4-Trichlorobenzene
- ✓ Hexachlorobenzene
- ✓ 1,2,-Dichloroethane
- ✓ 1,1,1-Trichloroethane
- ✓ Hexachloroethane
- ✓ 1,1-Dichloroethane
- ✓ 1,1,2-Trichloroethane
- ✓ 1,1,2,2-Tetrachloroethane
- ✓ Chloroethane
- ✓ Bis (2-chloroethyl) ether
- ✓ 2-Chloroethyl vinyl ether (mixed)
- ✓ 2-Chloronaphthalene
- ✓ 2,4,6-Trichlorophenol
- ✓ Parachlorometa cresol
- ✓ Chloroform (trichloromethane)
- ✓ 2-Chlorophenol
- ✓ 1,2-Dichlorobenzene
- ✓ N-nitrosodi-n-propylamine
- ✓ Pentachlorophenol
- ✓ Phenol
- ✓ Bis (2-ethylhexyl) phthalate
- ✓ Butyl benzyl phthalate
- ✓ Di-n-butyl phthalate
- ✓ Di-n-octyl phthalate
- ✓ Diethyl phthalate
- ✓ Dimethyl phthalate
- ✓ 1,2-Benzanthracene
- ✓ (benzo(a)anthracene)
- ✓ Benzo(a)pyrene (3,4-benzopyrene)
- ✓ 3,4-Benzofluoranthene (benzo(b)fluoranthene)
- ✓ 11,12-Benzofluoranthene (benzo(k)fluoranthene)
- ✓ Chrysene
- ✓ Acenaphthylene
- ✓ Anthracene
- ✓ 1,12-Benzoperylene (benzo(ghi)perylene)
- ✓ Fluorene
- ✓ Phenanthrene
- ✓ 1,2,5,6-Dibenzanthracene (dibenzo(a,h)anthracene)

[3] The term "T", as in "Cadmium (T)", shall mean total.

- ✓ 1,3-Dichlorobenzene
- ✓ 1,4-Dichlorobenzene
- ✓ 3,3-Dichlorobenzidine
- ✓ 1,1-Dichloroethylene
- ✓ 1,2-Trans-dichloroethylene
- ✓ 2,4-Dichlorophenol
- ✓ 1,2-Dichloropropane
- ✓ 1,3-Dichloropropylene (1,3-dichloropropene)
- ✓ 2,4-Dimethylphenol
- ✓ 2,4-Dinitrotoluene
- ✓ 2,6-Dinitrotoluene
- ✓ 1,2-Diphenylhydrazine
- ✓ Ethylbenzene
- ✓ Fluoranthene
- ✓ 4-Chlorophenyl phenyl ether
- ✓ 4-Bromophenyl phenyl ether
- ✓ Bis (2-chloroisopropyl) ether
- ✓ Bis (2-chloroethoxy) methane
- ✓ Methylene chloride (dichloromethane)
- ✓ Methyl chloride (chloromethane)
- ✓ Methyl bromide (bromomethane)
- ✓ Bromoform (tribromomethane)
- ✓ Dichlorobromomethane
- ✓ Chlorodibromomethane
- ✓ Hexachlorobutadiene
- ✓ Hexachlorocyclopentadiene
- ✓ Isophorone
- ✓ Naphthalene
- ✓ Nitrobenzene
- ✓ 2-Nitrophenol
- ✓ 4-Nitrophenol
- ✓ 2,4-Dinitrophenol
- ✓ 4,6-Dinitro-o-cresol
- ✓ N-nitrosodimethylamine
- ✓ N-nitrosodiphenylamine
- ✓ Indeno(1,2,3-cd) pyrene (2,3-o-phenlene pyrene)
- ✓ Pyrene
- ✓ Tetrachloroethylene
- ✓ Toluene
- ✓ Trichloroethylene
- ✓ Vinyl chloride (chloroethylene)
- ✓ Aldrin
- ✓ Dieldrin
- ✓ Chlordane (technical mixture and metabolites)
- ✓ 4,4-DDT
- ✓ 4,4-DDE (p,p-DDX)
- ✓ 4,4-DDD (p,p-TDE)
- ✓ Alpha-endosulfan
- ✓ Beta-endosulfan
- ✓ Endosulfan sulfate
- ✓ Endrin
- ✓ Endrin aldehyde
- ✓ Heptachlor
- ✓ Heptachlor epoxide
- ✓ (BHC-hexachloro-cyclohexane)
- ✓ Alpha-BHC
- ✓ Beta-BHC
- ✓ Gamma-BHC
- ✓ Delta-BHC
- ✓ (PCB-polychlorinated biphenyls)
- ✓ PCB-1242 (Arochlor 1242)
- ✓ PCB-1254 (Arochlor 1254)
- ✓ PCB-1221 (Arochlor 1221)
- ✓ PCB-1232 (Arochlor 1232)
- ✓ PCB-1248 (Arochlor 1248)
- ✓ PCB-1260 (Arochlor 1260)
- ✓ PCB-1016 (Arochlor 1016)
- ✓ Toxaphene
- ✓ 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)

The Permittee needs to analyze for only those TTO pollutants which would reasonably be expected to be present.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Clark County/Salmon Creek POTW from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the POTW and HDSD. Applicable limits for this discharge include the following:

Table 4 Hazel Dale Sewer District local limits

Parameter	Units	Limits [maximum for any 1 day]
pH	Standard units	6.0-9.0
Total Suspended Solids (TSS)	Milligrams per liter (mg/L)	300[4]
5-day Biochemical Oxygen Demand (BOD_5)	mg/L	240[5]
Arsenic	mg/L	0.1
Barium	mg/L	5.5
Beryllium	mg/L	90
Cadmium	mg/L	0.3
Chlorine Demand	mg/L	20
Chromium	mg/L	1.7
Copper	mg/L	2.2
Cyanide	mg/L	0.2
Iron	mg/L	10
Lead	mg/L	0.4
Mercury	mg/L	0.05
Nickel	mg/L	2.1
Selenium	mg/L	0.1
Silver	mg/L	0.1
Zinc	mg/L	2.3
Phenols or Cresols	mg/L	0.6
Oil and grease (total of petroleum and vegetable based)	mg/L	50

PROPOSED LIMITS

If parameter is listed in both tables, **Table 3** and **Table 4**, Pro-Tech is required to comply with the most stringent maximum for any one day, Table 5.

[4] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds BOD_5 limit.

[5] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds TSS limit.

Table 5 HDSD and PSNS combine limits

Parameter	Units	Maximum for any 1 day	Monthly average shall not exceed
pH	Standard units	6.0-9.0	
Total Suspended Solids (TSS)	Milligrams per liter (mg/L)	300[6]	
5-day Biochemical Oxygen Demand (BOD_5)	mg/L	240[7]	
Arsenic	mg/L	0.1	
Barium	mg/L	5.5	
Beryllium	mg/L	90	
Cadmium (T[8])	mg/L	0.11	0.07
Chlorine Demand	mg/L	20	
Chromium (T)	mg/L	1.7	1.71
Copper (T)	mg/L	2.2	2.07
Cyanide (T)	mg/L	0.2	0.65
Iron	mg/L	10	
Lead (T)	mg/L	0.4	0.43
Mercury	mg/L	0.05	
Nickel (T)	mg/L	2.1	2.38
Selenium	mg/L	0.1	
Silver (T)	mg/L	0.1	0.24
Zinc (T)	mg/L	2.3	1.48
Phenols or Cresols	mg/L	0.6	
TTO[9]	mg/L	2.13	
Oil and grease (total of petroleum and vegetable based)	mg/L	50	

[6] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds BOD_5 limit.
[7] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds TSS limit.
[8] Total
[9] As defined before in Table 3

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains Condition S.5 as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued until June 30, 2008.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations(http://www.ecy.wa.gov/laws-rules/index.html)

Permit and Wastewater Related Information
(http://www.ecy.wa.gov/programs/wq/wastewater/index.html

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on May 16, 2004, and May 23, 2004, in the *Columbian* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on March 7, 2005, in the *Columbian* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Industrial Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within 30 days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6280, or by writing to the address listed above.

This permit was written by Jacek Anuszewski, P.E.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater

facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of

various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—TECHNICAL CALCULATIONS

APPENDIX D—RESPONSE TO COMMENTS

The Department has received comments from:

- Kim Kagelaris, Pretreatment Coordinator of Hazel Dell Sewer District, on March 8, 2005
- Tevis Laspa, CEO of Pro-Tech Industries, Inc., on March 31, 2005 and April 1, 2005

The following is a list of received comments and department's responses:

COMMENTS

Kim Kagelaris:

Hazel Dell Sewer District revised the Pretreatment Resolution last year and the changes were adopted by the Board of Commissioners in February, 2005. Here is a copy of the updated code.

The local limit for oil and grease was changed to:
50 mg/L (non-polar)
100 mg/L (polar)

Please update Pro-Tech's permit to reflect the new local limit for oil and grease.

Department:

Comment noted.

Action Taken:

Pro-Tech's permit has been updated to reflect the revised Pretreatment Resolution. In addition the Department has changed the permit language that accompanies each permit limit based on the HDSD local limits:

> *As defined in the HDSD Pretreatment Resolution, Chapter 5.52 Wastewater Pretreatment. If a clarification is necessary it will be provided by the HDSD.*

Kim Kagelaris:

Also, I (quickly) reviewed Pro Tech's application for the wastewater discharge permit (dated 10/10/03) which contains a schematic of the Phosphatizing Process showing treatment. The permit requires continuous monitoring for pH, but this schematic does not show a pH meter.

Department:

Comment noted.

Action Taken:

The continuous monitoring for pH has been changed to once during each batch discharge [once per batch].

Tevis Laspa:

I was discussing some of the details of the permit with Kim Calenderas [Kagelaris] of Hazeldell [Hazel Dell] Sewer district. We found a little grey are that I would like to get clarified.

We are going to install a recording Ph meter that keeps track of the ph level in the lime as the effluent is pumping. This recorder will not record when the pump is off. We anticipate only pumping for about 20 minutes a day to drain our 300 gallon tank. We are also going to install a ph controller that will shut the pump off if our ph in the pumped line approaches our limits.

Department:

Comment noted.

Action Taken:

The continuous monitoring for pH has been changed to once during each batch discharge [once per batch].

Tevis Laspa:

We are batch processing the effluent from our tank. Your footnote says that sampling shall be taken once during each batch discharge when continuous monitoring is not possible. The cost, time, and maintenance to do continuous monitoring on a batch type discharge system is very onerous. The pump will only be running for 10 minutes a day to drain our 300 gallon tank. We would have to disassemble the continuous probe to test it, and then reassemble. This will take longer than the pumping process.

We propose using a mixer on the tank to keep the water solution well mixed. We will then test the tank for PH, adjust to control parameters, and be virtually guaranteed that it will remain constant during pumping. We will not wire the phosphate cleaner to not operate while the pump is on. This will guarantee that the solution will stay the same.

Department:

Comment noted.

Action Taken:

The continuous monitoring for pH has been changed to once during each batch discharge [once per batch].